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February 11, 2022

The Honorable Denis R. Hurley
United States District Court for the
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re Request for Extension of Time to File Objections to Report and Recommendation and
Motion to Vacate Certificate of Default, *Geis v. Delahunt*, 2:20-cv-03834-DRH-JMW**

Dear Judge Hurley:

I write to request a 30-day extension of time for Defendant, Jamie Delahunt, to file objections to the Honorable Magistrate James M. Wicks' Report and Recommendation dated December 2, 2021, and to file a motion to vacate the certificate of default in this matter.

Upon the filing of pre-motion letters pursuant to this Court's rules, by order dated January 27, 2022, this Court set the following briefing schedule for Defendant to file a single motion setting forth any objections to the Magistrate's Report and Recommendation and Motion to Vacate the Certificate of Default. That briefing schedule is as follows:

Defendant to file motion by February 14, 2022
Plaintiff's opposition by March 4, 2022; and
Defendant's reply by March 11, 2022

The parties have stipulated, subject to this Court's approval, the following revised briefing schedule:

Defendant's Motion Due: March 16, 2022
Plaintiff's Opposition Due: April 4, 2022
Defendant's Reply Due: April 11, 2022

Request for Extension of Time
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I made this request of Plaintiff's counsel because I recently had an eye procedure. I also have a reply brief due in the Third Circuit within the next three weeks. Nonetheless, I believe that the briefing schedule set forth above should be sufficient for Defendant to file his motion.

This is the first application for an extension of time since the Court set a unified briefing schedule for Defendant to file his motion to vacate and objections to the Report and Recommendation on January 27, 2022.

This application is on consent of Plaintiff.

Respectfully submitted,

/s/ Joseph Z. Amsel, Esq.

CC: To All Appearing Counsel Via ECF